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12
13 **UNITED STATES DISTRICT COURT**
14 **EASTERN DISTRICT OF WASHINGTON**
15 **AT YAKIMA**

15 STATE OF WASHINGTON, et
16 al.,

17 Plaintiffs,

18 v.

19 DONALD J. TRUMP, et al.,

20 Defendants.

NO. 1:20-cv-03127-SAB

DECLARATION OF EMMA
GRUNBERG IN SUPPORT OF
PLAINTIFFS' RESPONSE TO
DEFENDANTS' MOTION TO
CLARIFY THE
PRELIMINARY INJUNCTION

NOTED FOR: October 2,
2020
Without Oral Argument

26 DECLARATION OF EMMA
GRUNBERG ISO PLAINTIFFS'
RESPONSE TO DEFENDANTS'
MOTION TO CLARIFY
PRELIMINARY INJUNCTION
NO. 1:20-CV-03127-SAB

1 I, Emma Grunberg, declare and affirm:

2 1. I am a Deputy Solicitor General with the Washington State Office
3 of the Attorney General. I have personal knowledge of the matters stated herein,
4 and if called as a witness, I would testify competently to this information.

5 2. Attached as Exhibit A is a true and correct copy of an Order of the
6 U.S. District Court for the Southern District of New York, entered on September
7 25, 2020 as Docket No. 57 in *Mondaire Jones et al. v. United States Postal*
8 *Service et al.*, Case No. 20 Civ. 6516 (VM).

9 3. Attached as Exhibit B is a true and correct copy of a USPS document
10 entitled *Additional Resources for Election Mail Beginning October 1* and dated
11 September 25, 2020, and available at: <https://bit.ly/3iqy8Bz>.

12 4. Attached as Exhibit C is a true and correct copy of a USPS document
13 entitled *Clarifying Operational Instructions* and dated September 21, 2020, and
14 available at <https://bit.ly/3jrbdao>.

15 5. On October 1, 2020, counsel for Plaintiffs, including myself,
16 conferred with Joseph Borson, counsel for Defendants, by telephone and email
17 regarding Plaintiffs' proposed order, submitted herewith, and Defendants
18 indicated that they do not oppose Plaintiffs' proposed order.

19 I declare under penalty of perjury of the laws of Washington that the
20 foregoing is true and correct.

21 DATED this 1st day of October, 2020.

22 s/ Emma Grunberg

23 EMMA GRUNBERG, WSBA #54659

24 Deputy Solicitor General

Attorney General's Office of Washington State

DECLARATION OF SERVICE

I hereby declare that on this day I caused the foregoing document to be electronically filed with the Clerk of the Court using the Court's CM/ECF System which will serve a copy of this document upon all counsel of record.

DATED this 1st day of October, 2020, at Tumwater, Washington.

/s/ Jennifer D. Williams

JENNIFER D. WILLIAMS

Paralegal